

PHILLIP A. TALBERT  
United States Attorney  
CHRISTOPHER D. BAKER  
Assistant United States Attorney  
4550 California Ave., Suite 640  
Bakersfield, CA 93309  
Telephone: (661) 489-6150  
Facsimile: (661) 489-6151

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RAYLON THIJAY RANDLE,  
  
Defendant.

CASE NO. 1:21-CR-00246-DAD-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
AND ORDER

DATE: August 24, 2022

TIME: 1:00 p.m.

COURT: Hon. Magistrate Judge Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on August 24, 2022.
2. By this stipulation, the parties move to continue the status conference until October 12, 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between August 24, 2022, and October 12, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Initial discovery was provided to defendant on or about October 18, 2021, consisting of 114 Bates-stamped items including reports of investigation, body worn camera recordings, photographs, certified conviction records and a summary of defendant's criminal history.

1           b)     The government transmitted a plea offer to counsel for defendant on February 15,  
2     2022.

3           c)     Counsel for defendant desires additional time to review discovery, consult with  
4     her client, conduct investigation and research related to the charges, and to otherwise prepare for  
5     trial.

6           d)     Counsel for defendant believes that failure to grant the above-requested  
7     continuance would deny her the reasonable time necessary for effective preparation, taking into  
8     account the exercise of due diligence.

9           e)     Based on the above-stated findings, the ends of justice served by continuing the  
10    case as requested outweigh the interest of the public and the defendant in a trial within the  
11    original date prescribed by the Speedy Trial Act.

12          f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
13    et seq., within which trial must commence, the time period of August 24, 2022 to October 12,  
14    2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it  
15    results from a continuance granted by the Court at defendant's request on the basis of the Court's  
16    finding that the ends of justice served by taking such action outweigh the best interest of the  
17    public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 16, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ CHRISTOPHER D. BAKER  
CHRISTOPHER D. BAKER  
Assistant United States Attorney

Dated: August 16, 2022

/s/ CHRISTINA CORCORAN  
CHRISTINA CORCORAN  
Counsel for Defendant  
RAYLON THIJAY RANDLE

**ORDER**

IT IS SO ORDERED that the status conference is continued from August 24, 2022, to **October 12, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: August 17, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE